
-----Original Message-----

From: Hurwitz, Evelyn S On Behalf Of Public Info
Sent: Tuesday, October 03, 2000 1:40 PM
To: Gottlieb, Mary H
Subject: FW: Proposed Changes to 2001 TFR

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-----Original Message-----

From: Chris Wills [mailto:Chris_Wills@troweprice.com]
Sent: Tuesday, October 03, 2000 12:33 PM
To: 'public.info@ots.treas.gov'
Cc: Karen Nash-Goetz; Susanne Piccirillo
Subject: Proposed Changes to 2001 TFR

Manager, Dissemination Branch
Information Management and Services Division
Office of Thrift Supervision
1700 G. Street, N.W.
Washington, DC 20552

T. Rowe Price Savings Bank, located in Baltimore, Maryland, has reviewed the proposed changes to the 2001 Thrift Financial Report, to be implemented with the March 31, 2001 report. Of particular concern to the Savings Bank is the proposal to add three new data items in Schedule SI to collect average asset and liability data. In our view, as a small institution, the quarterly calculation of average total assets, average interest-earning assets and average interest-costing liabilities, whether using daily or weekly balances adds an unnecessary burden to the existing reporting requirements.

The key reason for inclusion of the data seems to be avoidance of skewed data when restructurings and acquisitions occur, but these infrequent events should not drive a requirement for all institutions to calculate and report such data quarterly. At most, this data should be required as a supplement when restructurings and acquisitions occur. The other reasons listed for the change were to produce "more accurate" or "better" data. While the Savings Bank recognizes that there can be value in such a goal, it should be weighted against the costs associated and burdens imposed, particularly for small institutions that are well capitalized and managed. In light of these concerns, we ask that the OTS drop the proposal for these data items, or

at
least consider tailoring their applicability to institutions and
circumstances where the data will have greater relevance and, thus, more
fully justify the burden.

We appreciate the opportunity to comment on the proposed changes to the
2001

TFR. Should you have any questions on our concerns, please do not
hesitate
to call me at 410-345-7737.

Sincerely,

Christopher R. Wills
Chief Financial Officer
T. Rowe Price Savings Bank
100 East Pratt Street
Baltimore, Maryland 21202